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*Attorney for Defendant*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

JWAL SHELAT, individually and on behalf of  
all other persons similarly situated,

Plaintiff,

v.

KAIZENCURE LLC, d/b/a CRAFTORIA,

Defendant.

Case No.: 3:24-cv-04696-AMO

Hon. Araceli Martínez-Olgún

**JOINT STIPULATION AND  
~~PROPOSED~~ ORDER OF  
DISMISSAL WITH PREJUDICE**

WHEREAS, on August 2, 2024, Plaintiff filed the Complaint in the above-captioned action;

WHEREAS, on December 17, 2024, Defendant filed a Motion to Dismiss the Complaint (the "Motion") [DE 27];

WHEREAS, on February 20, 2025, the Court entered an Order Regarding Discovery [DE 38] staying all deadlines for discovery pending resolution of the Motion;

WHEREAS, on May 14, 2025, the Parties hereto entered into a Settlement Agreement settling and dismissing Plaintiff's claims alleged in this case;

WHEREAS, Rule 41(a)(1)(A)(ii) of the of the Federal Rules of Civil Procedure provides that a plaintiff may voluntarily dismiss an action without a court order by filing a stipulation of dismissal signed by all parties who have appeared;

WHEREAS, Rule 23(e) of the Federal Rules of Civil Procedure only requires court approval of a proposed settlement, voluntary dismissal, or compromise of the claims, issues, or defenses of a certified class or a class proposed to be certified for purposes of settlement;

WHEREAS, no class has been certified in the above-captioned action; and

WHEREAS, the Settlement Agreement does not settle, dismiss, or compromise the claims, issues, or defenses of the putative class in the above-captioned action:

IT IS HEREBY STIPULATED AND AGREED, by Plaintiff and Defendant, through their undersigned counsel, and pursuant to Civil Local Rule 7-12, that the above-captioned action is hereby dismissed with prejudice. Each party shall bear its own attorneys' fees and costs.

Dated: May 14, 2025

Respectfully submitted,

/s/ Neal J. Deckant

/s/ Brianna K. Pierce

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**SIGNATURE ATTESTATION**

Pursuant to Civil L.R. 5-1(i)(3), the filer of this document attests that all signatories have concurred in its filing.

/s/ Neal J. Deckant  
Neal J. Deckant

